

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the matter of )  
 )  
AMENDEMENT OF PART 97 OF THE )  
COMMISSION'S RULES TO ) WT Docket No. 05-235  
IMPLEMENT WRC-03 REGULATIONS )  
IN THE AMATEUR RADIO SERVICE )  
 )  
NOTICE OF PROPOSED RULE MAKING )  
 )

October 17, 2005

To: The Chief, Wireless Telecommunications Bureau

**COMMENTS ON THE NOTICE OF PROPOSED RULE MAKING, WT -05-235**

I. Introduction

I have been a licensed operator since 1972. I have an Amateur Extra class license W8EH. I am a volunteer examiner for the ARRL-VEC. I participate as an instructor in the Dial Radio Club license preparation classes.

In my comments, I will attempt to point out some minor flaws in the commission's proposal, so that you may consider making revisions to the NPRM.

II. Commission Proposed Technician Privileges

The commission NPRM as I understand does not specifically address the issue of HF privileges for the Technician license. **I see this as a major oversight.** The discussion in paragraph 24 is not very clear. It kind of appears that you are going to deny all HF access to Technician licenses. This is my major concern.

At the present time, a Technician licensee can make a partial 'upgrade' by passing a 5 word per minute Morse code exam. They then gain HF voice privileges on 10 meters, and HF CW privileges on 80, 40, 15 and 10 meters. The only difference between the Technician and the 'Technician with code' is the code test. At the present time, the 5 word per minute test is the only barrier for the Technician to cross to get on HF. So, if you remove the 5 word per minute Morse code test, you should allow for all Technician licenses to gain access to the above existing HF band segments automatically. It makes perfect sense to me to give them that HF access.

If you do not give the HF privileges (after removing the Morse code test), it will be impossible for the codeless Technicians to do the partial 'CW upgrade' to HF privileges. They will be forever separated from those Technicians who passed the 5 word per minute CW test and gained HF privileges.

By 'removing' the Morse code (CW) requirement, this simple path for Technicians to gain access to the bands below 30 MHz will be eliminated. This proposed elimination of CW testing will be a LOSS for the Technician, NOT a gain.

ALL Technician Plus and Technician licenses should be granted HF privileges consistent with those existing for the Technician Plus and Novice upon implementation of this NPRN.

### III. How to Enhance the Technician License

The commission in paragraph 30 of the NPRM implies that it will be easy for a person to get HF privileges by taking the Technician and General written test. As an experienced license class instructor and examiner, I can speak from experience that it IS NOT EASY. Has the person who wrote this NPRM ever studied for the present tests or read over the question pools? Going from nothing to General isn't easy, except for the very technically inclined person. It is VERY hard for the typical teenager who has not been exposed to ham radio or the technical side of radio and electronics. In my experience as an instructor, we have seen a drop out rate for the Technician and General classes that exceeds 50%. The tests can be difficult. So it is, and WILL BE, difficult for a beginner or Technician to gain full HF bands access by upgrading to General.

The commission in the NPRM quickly dismissed proposals to either enhance the Technician with better HF bands access or to create a true better beginner class license. Most of these proposals were from recognized national organizations including the ARRL and NCVEC. These proposals were well thought out and had the support of many amateur operators. I feel that the commission failed to properly consider these submissions.

The beginner level license (now Technician) needs a good taste of 'voice' operation on the world wide HF bands. They need more than they can get now by passing the Morse code exam to get the Technician with code. Presently on HF, they are limited to voice on one band (10 meters) and CW only on 4 bands. The 10 meter voice band is not very usable during the low in the 11 year sun spot cycle. During these times, 10 meter band users can usually only talk locally, the same distances they can on VHF and UHF. They don't get much chance to contact distant stations. The Technicians need access to voice on a couple other HF bands, where they can keep their interest up, mix in with the mainstream HF operators and talk some distances. They also need continued access to CW segments on the HF bands. **Small limited** band segments on several bands will give them that taste, keep their interest, and give them the incentive to upgrade.

I propose that in addition to the existing Novice/Technician sub bands on 80, 40, 15, and 10 meters, the technician be **enhanced** with a 50 KHz single side band voice segment on 75 meters and 25 KHz single side band voice segment on 40 meters. These additional operators with 'HF band' privileges can be used for state wide and regional emergency net activities. The 75/80 meter band is 500 KHz wide, more than enough room to fit in the 50 KHz Technician band. The 40 meter band is 300 KHz wide, but not that crowded. After the commission makes adjustments to widen the phone bands, these proposed segments will fit without trouble.

They should remain limited by the 200 watt (or less) power limit on the HF bands as well as be limited to the CW and phone modes on HF.

Your statement in several sections of the NPRM that licenses should not receive additional privileges without a test, is not based on any precedent. In the past during changes in the license structure, there were significant changes in privileges. Privileges were mostly enhanced, privileges were rarely taken away.

Many other countries allow their entry level licenses limited privileges on both VHF and HF bands. We need to do the same here. Examples of two countries with a basic beginner license are Great Britain and Canada. Great Britain has what is called a 'Foundation License'. This license gives a beginner operating privileges on almost all bands but is limited to 10 watts output. They also have other limitations. In Canada they have a 'Basic Qualification' license. They allow all band operation with Morse code qualification at a reduced power limitation. There are also other limits.

The key here is that the basic entry level license (technician) should include significant and usable voice and CW privileges on both the HF and VHF/UHF bands. Allowing Technicians limited voice operating privileges on 75, 40 and 10 meters does not give them too much extra, nor does it reduce the incentive for them to upgrade. In fact it should do the opposite. It will allow for the true 'beginner' to get a good taste of HF operation, allow them to mix with and learn from others, and tempt them to study to upgrade to General or Extra class.

A VHF/UHF only Technician license is a dead end for most amateurs.

The commission should re-examine granting significant HF access to the Technician license. Consider it an 'adjustment' to their privileges.

#### IV. Technician Qualifications

In the NPRM paragraph 31, the commission asserts that the Technician license questions are directed toward VHF/UHF. **I wish to rebut those statements.**

Yes the majority of the Technician privileges are VHF/UHF, but there continues to be good coverage of HF propagation, rules, safety, operation and technical topics in the Technician exam question pool. The commission should review the present Technician question pool for an education.

I've read through the question pool and found 35 questions that apply directly to HF operation, and 17 questions apply to both HF and VHF/UHF. That's 52 questions that relate to HF operations. I also counted 44 questions that directly apply to VHF/UHF operation, with an additional 20 that apply to repeater operation. So it appears to me that there are significant questions on HF operation. How do those numbers add up to you?

The following questions apply DIRECTLY to HF operations:

T1B10, T1B12, T2B01, T2B02, T2B05, T2B06, T2B11, T2B12, T3A01, T3A02, T3A03, T3A04, T3A05, T3A06, T3A07, T3A08, T3A09, T3A11, T3A12, T3B07, T3B08, T3B11, T3B12, T3B13, T5C05, T5C07, T6A02, T6A03, T6C06, T6C11, T7B08, T7B09, T0D08, T0D10, T0D11.

And these items apply to both HF and VHF/UHF operations:

T6A07, T6A09, T6A10, T6B01, T6B02 T6B06, T6B07, T6A08, T6A09, T6A10, T6A11, T6A12, T6C05, T6C06, T6C07, T6C10, T8B02.

The commission reasons in this NPRM that the Technician licensees have not passed a significant number of test questions that apply to HF operating, so the Technician license as it exists doesn't qualify for HF. As indicated above, they do have to prove some HF operating qualifications in the existing exam questions.

**So this data above should prove to you that HF testing is NOT neglected in the Technician exam.**

## V. Conclusion

The commission failed to properly address the privileges of the entry level license. The commission should grant all Technician license access to reasonable but limited HF voice and Morse code band segments.

I hope that the commission gives weight to my comments and makes the suggested changes in the proposal.

Respectfully submitted,

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## Appendix A:

My proposed rule changes:

Chapter 1 of Title 47 of the Code of Federal Regulations is proposed to be amended as follows:

Part 97 - Amateur Radio Service

Subpart D--Technical Standards

S 97.301 Authorized frequency bands.

(e) For a station having a control operator who has been

granted an operator license of Novice Class.

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(f) For a station having a control operator who has been granted an operator license of Technician Class.

Wavelength band	ITU Region 1	ITU Region 2	ITU Region 3	Sharing requirements See §97.303, Paragraph:
HF	MHz	MHz	MHz	
80 m	3.675-3.725	3.675-3.725	3.675-3.725	(a)
75 m	-	3.950-4.000	3.850-3.900	(a)
40 m	7.050-7.075	7.10-7.15	7.050-7.075	(a)
-do-	-	7.275-7.30	7.075-7.100	(a)
15 m	21.10-21.20	21.10-21.20	21.10-21.20	
10 m	28.10-28.50	28.10-28.50	28.10-28.50	

§97.313 Transmitter power standards.

(c ) (2) The 28.1-28.5 MHz segment when the control operator is a Novice Class operator or a Technician; or the 3.95-4.0 MHz and 7.275-7.3 MHz segments when the control operator is a Technician; or